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6 *Pro Se* Movant

**FILED**

**04/01/2025**

**U.S. DISTRICT COURT**  
**SOUTHERN DISTRICT OF INDIANA**  
**Kristine L. Seufert, Clerk**

7  
8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF INDIANA**  
10 **INDIANAPOLIS DIVISION**

11 **IN RE:**  
12 **SEALED CASE(S)**

CASE NO.: 1:25-mc-00022-TWP-TAB

**MOTION TO UNSEAL SEARCH  
WARRANTS**

1 Riana Pfefferkorn, moving *pro se*, is a researcher at Stanford University who studies  
 2 cybersecurity as well as government surveillance and the Fourth Amendment. Movant  
 3 respectfully requests that the Court unseal two recently-executed search warrants that, on  
 4 information and belief, were issued by a judge in the Indianapolis division of this Court, but for  
 5 which Movant cannot provide case numbers because the matters are sealed.

6 According to reports in the news media, on or about March 28, 2025, agents of the  
 7 Federal Bureau of Investigation (FBI) and the Department of Homeland Security (DHS)  
 8 conducted court-authorized searches of two residences allegedly owned by two individuals who  
 9 until recently were employed by Indiana University (IU): Xiaofeng Wang, who was an IU  
 10 computer science professor specializing in system security and data privacy; and his wife,  
 11 current or former IU Libraries analyst Nianli Ma.<sup>1</sup> One of the two residences reportedly searched  
 12 was on the 3000 block of Xavier Court in Bloomington, Monroe County, Indiana;<sup>2</sup> the other, at  
 13 an undisclosed address in Carmel, Hamilton County, Indiana.<sup>3</sup> Those locations fall within the  
 14 Indianapolis Division of this Court.<sup>4</sup>

15 There is intense public interest in this matter, as shown by press coverage ranging from  
 16 the IU student newspaper to state,<sup>5</sup> national,<sup>6</sup> and even international outlets.<sup>7</sup> However, the press  
 17

18 <sup>1</sup> See Andrew Miller, “FBI searches two homes belonging to IU Luddy professor and library  
 19 analyst,” *Indiana Daily Student* (Mar. 29, 2025), [https://www.idsnews.com/article/2025/03/iu-](https://www.idsnews.com/article/2025/03/iu-professor-bloomington-carmel-fbi-search)  
 20 professor-bloomington-carmel-fbi-search; Andrew Miller, “BREAKING: IU terminated  
 professor the same day the FBI searched his homes,” *Indiana Daily Student* (Mar. 31, 2025),  
 21 <https://www.idsnews.com/article/2025/03/wang-xiaofeng-iu-luddy-fbi-search>.

22 <sup>2</sup> Laura Lane, “FBI, Homeland Security agents search house on Xavier Court in Bloomington,”  
 23 *The Herald-Times* (Mar. 28, 2025),  
 24 [https://www.heraldtimesonline.com/story/news/local/2025/03/28/fbi-department-of-homeland-](https://www.heraldtimesonline.com/story/news/local/2025/03/28/fbi-department-of-homeland-security-agents-search-house-in-bloomington-indiana/82710451007/)  
 security-agents-search-house-in-bloomington-indiana/82710451007/.

25 <sup>3</sup> Dan Mangan, “Indiana U. fired cybersecurity professor XiaoFeng Wang on day FBI searched  
 26 his homes: Union,” *CNBC* (Mar. 31, 2025), [https://www.cnn.com/2025/03/31/fbi-searches-](https://www.cnn.com/2025/03/31/fbi-searches-xiaofeng-wang-homes-indiana-university-cybersecurity-computer.html)  
 27 xiaofeng-wang-homes-indiana-university-cybersecurity-computer.html.

28 <sup>4</sup> District Map, Southern District of Indiana, [https://www.insd.uscourts.gov/nodeblock/district-](https://www.insd.uscourts.gov/nodeblock/district-map)  
 map.

<sup>5</sup> George Hale, “FBI won’t say why agents searched homes of IU cybersecurity expert,” *Indiana Public Media* (Mar. 30, 2025), [https://indianapublicmedia.org/news/fbi-wont-say-why-agents-](https://indianapublicmedia.org/news/fbi-wont-say-why-agents-searched-homes-of-iu-cybersecurity-expert.php)  
 searched-homes-of-iu-cybersecurity-expert.php.

<sup>6</sup> Dan Goodin, “Cybersecurity Professor Mysteriously Disappears as FBI Raids His Homes,”  
*Wired* (Mar. 31, 2025), [https://www.wired.com/story/cybersecurity-professor-mysteriously-](https://www.wired.com/story/cybersecurity-professor-mysteriously-disappears-as-fbi-raids-his-homes/)  
 disappears-as-fbi-raids-his-homes/.

1 and the public remain in the dark about the government’s reasons for the search. The government  
 2 and IU have refused to comment on the matter.<sup>8</sup> In the absence of any more information, the  
 3 mystery swirling around government raids of a Chinese immigrant academic’s homes has  
 4 prompted speculation and rumor – which this Court is in a unique position to alleviate.

5 The public has a right to access the warrants and supporting materials in question under  
 6 both the First Amendment and common law. *E.g.*, *Nixon v. Warner Commc’ns*, 435 U.S. 589  
 7 (1978) (common-law right to access court records); *United States v. Bus. of the Custer Battlefield*  
 8 *Museum & Store*, 658 F.3d 1188, 1193 (9th Cir. 2011) (common-law right of access to warrant  
 9 materials); *In re Search Warrant for Secretarial Area Outside the Office of Thomas Gunn*, 855  
 10 F.2d 569, 573 (8th Cir. 1988) (qualified constitutional right of access to search warrant  
 11 applications following warrant’s execution, even if investigation was still ongoing); *In re N.Y.*  
 12 *Times Co.*, 585 F. Supp. 2d 83, 86 (D.D.C. 2008) (public has a First Amendment right of access  
 13 to “search warrants, warrant applications, supporting affidavits, court orders, and returns for [the]  
 14 warrants.”).

15 The public deserves to know why the federal government raided the homes of a Chinese  
 16 immigrant professor, during a time when the executive branch has begun scrutinizing and taking  
 17 adverse action against multiple universities as well as even legal immigrants. Unsealing the  
 18 requested materials would inform the public and the news media and help to dispel rumor and  
 19 speculation arising from this unusual and newsworthy event. Movant and the public are unable to  
 20 access these records without the assistance of the Court because any identifying information  
 21 from which Movant could identify the relevant matters is sealed and outside of public view.

22 Unsealing would also serve the deep-seated American principle of open access to the  
 23

24 (Footnote Continued from Previous Page.)

25 <sup>7</sup> Holly Chik and Dannie Peng, “China Initiative 2.0? Raids on scientist Wang Xiaofeng revive  
 26 spectre from first Trump era,” *South China Morning Post* (Mar. 31, 2025),  
 27 [https://www.scmp.com/news/china/science/article/3304619/china-initiative-20-raids-scientist-](https://www.scmp.com/news/china/science/article/3304619/china-initiative-20-raids-scientist-wang-xiaofeng-revive-spectre-first-trump-era)  
 28 [wang-xiaofeng-revive-spectre-first-trump-era](https://www.scmp.com/news/china/science/article/3304619/china-initiative-20-raids-scientist-wang-xiaofeng-revive-spectre-first-trump-era).

<sup>8</sup> See Hale, *supra* n.5 (quoting IU spokesman Mark Bode as saying, “At the direction of the FBI, Indiana University will not make any public comments regarding this investigation”).

1 courts by disclosing documents for which there is no longer any reason for continued secrecy.  
 2 Now that the warrants have been executed, unsealing would not jeopardize any law enforcement  
 3 interests – it is too late for Wang or Ma to try to hide or destroy any evidence from their homes –  
 4 nor would unsealing the warrants tip off any potential associates of Wang or Ma, whose  
 5 association with the searched residences is now common knowledge thanks to press reports.  
 6 Plus, redactions should be sufficient to protect any privacy or reputational interests of any  
 7 persons named in the warrants or supporting materials (besides Wang and Ma of course).

### 8 **RELIEF REQUESTED**

9 Movant seeks the unsealing of the sealed docket sheets, search warrants, warrant returns,  
 10 any supporting affidavits and other supporting materials, and all other sealed docket items, for  
 11 the two search warrants of the homes in Bloomington and Carmel, Indiana, as described above.  
 12 At minimum, Movant requests the Court unseal at least the docket sheets of the two warrant  
 13 matters so that members of the press and public can see what docket entries have been filed and  
 14 move to unseal specific docket items.

15 To the extent there is any information contained anywhere in the filings for which there is  
 16 still a need for secrecy, Movant requests that the Court protect that information through  
 17 redactions rather than through continued wholesale sealing of the entire document. For example,  
 18 Movant is not seeking to unseal the names or other identifying information of any targets of any  
 19 investigation (besides Wang and Ma, whose identities are already disclosed) or their associates,  
 20 or of any witnesses or confidential informants. Names and other identifying information can be  
 21 redacted from unsealed materials.

22  
 23 Respectfully submitted,

24 Dated: April 1, 2025

25 *Riana Pfefferkorn*

26 RIANA PFEFFERKORN

27 *Pro Se*  
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